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Proposed Counsel for the Debtor

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
Manhattan Country School,	:	
a/k/a Manhattan Country School, Inc.,	:	Case No. 25-11009 (DSJ)
	:	
Debtor.	:	
	:	
-----X	:	

**NOTICE OF PRESENTMENT OF DEBTOR'S EMERGENCY MOTION
TO CONVERT THIS CHAPTER 11 CASE TO A CASE UNDER CHAPTER 7**

PLEASE TAKE NOTICE that the *Debtor's Emergency Motion to Convert This Chapter 11 Case to a Case Under Chapter 7* (the "Motion"), filed concurrently herewith, will be presented for signature to the Honorable David S. Jones, United States Bankruptcy Judge, Courtroom 701 at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004 on **June 16, 2025 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that objections, if any, to entry of an order approving the Motion must: (i) be made in writing; (ii) state with particularity the grounds therefor; (iii) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy

Rules for the Southern District of New York; (iv) be filed with the United States Bankruptcy Court for the Southern District of New York; and (v) be served upon: (a) proposed counsel for the Debtor, Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, NY 10019, Attn: Brian S. Lennon, Esq. (blennon@willkie.com), Stuart R. Lombardi, Esq. (slombardi@willkie.com), Betsy L. Feldman, Esq. (bfeldman@willkie.com), and Joseph R. Brandt, Esq. (jbrandt@willkie.com); (b) counsel to Flushing Bank, Certilman Balin Adler & Hyman, LLP, 90 Merrick Avenue, 9th Floor, East Meadow, NY 11554, Attn: Richard J. McCord, Esq. (rmccord@certilmanbalin.com), Robert D. Nosek, Esq. (rnosek@certilmanbalin.com), and Thomas J. McNamara, Esq. (tmcnamara@certilmanbalin.com); and (c) William K. Harrington, United States Trustee for Region 2, Alexander Hamilton U.S. Custom House, One Bowling Green, Rm. 534, New York, NY 10004, Attn: Paul Schwartzberg (paul.schwarzberg@usdoj.gov), and Annie Wells (annie.wells@usdoj.gov) (collectively, the “Notice Parties”). **The deadline by which objections to the Motion and entry of the Order must be filed and received by the Notice Parties is June 16, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).**

PLEASE TAKE FURTHER NOTICE that if no responses or objections are received by the Objection Deadline, the relief requested in the Motion may be granted without further notice or a hearing. If an objection is filed, you may be notified of a hearing to consider the requested relief.

[Signature Page Follows]

Dated: June 13, 2025
New York, New York

WILLKIE FARR & GALLAGHER LLP

By: /s/ Brian S. Lennon

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